

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

Leon D. Black,

Plaintiff,

- against -

Guzel Ganieva, Wigdor LLP, Joshua Harris,  
and Steven Rubenstein

Defendants.

No. 1:21-cv-08824-PAE

Hon. Paul A. Engelmayer

**NOTICE OF MOTION**

PLEASE TAKE NOTICE that, upon the memorandum of law accompanying this Notice of Motion, and the Declaration accompanying this Notice of Motion, which attaches the Proposed Second Amended Complaint, Plaintiff Leon D. Black moves this Court, before the Honorable Paul A. Engelmayer, United States District Judge, on a date and at a time to be set by the Court, at the Thurgood Marshall United States Courthouse, 40 Foley Square, New York, New York 10007, for an order, pursuant to Federal Rule of Civil Procedure Rule 15(a), granting leave to amend Plaintiff's First Amended Complaint. The basis for the motion is set forth in the accompanying memorandum of law and supported by the Declaration in support of the motion, which attaches the Proposed Second Amended Complaint.

Dated: April 18, 2022

Respectfully submitted,

*/s/ Susan R. Estrich*

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